

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MAURICE MUHAMMAD,

Plaintiff,

v.

NATIONAL ASSOCIATION OF  
REALTORS, PENNSYLVANIA  
ASSOCIATION OF REALTORS, GREATER  
LEHIGH VALLEY MULTIPLE LISTING  
SERVICE, ALLYSON LYSAGHT, ESQ.,  
JUSTIN POREMBO,

Defendants.

Case No. 5:24-cv-05543-JFL

Hon. Joseph F. Leeson, Jr.

**DEFENDANTS NATIONAL  
ASSOCIATION OF REALTORS®,  
PENNSYLVANIA ASSOCIATION OF  
REALTORS®, GREATER LEHIGH  
VALLEY REALTORS®, ALLYSON  
LYSAGHT, AND JUSTIN POREMBO’S  
MOTION TO DISMISS THE SECOND  
AMENDED COMPLAINT FOR FAILURE  
TO STATE A CLAIM**

Defendants National Association of REALTORS®, Pennsylvania Association of REALTORS®, Greater Lehigh Valley REALTORS®, Allyson Lysaght, and Justin Porembo (together “Moving Defendants”) bring this Motion to Dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure because the Second Amended Complaint fails to state a claim upon which relief can be granted.

Moving Defendants respectfully request that the Court dismiss Plaintiff’s Second Amended Complaint (ECF No. 49) in its entirety as to all Defendants, with prejudice, pursuant to Rule 12(b)(6).

Dated: March 10, 2025

NORRIS MCLAUGHLIN P.A.

s/ James J. Scanlon

James J. Scanlon

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Porembo, and Allyson Lysaght*

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Association of REALTORS®*

**CERTIFICATE OF NONCONCURRENCE**

I, James J. Scanlon, counsel for Defendants National Association of REALTORS®, Greater Lehigh Valley REALTORS®, Justin Poremba, and Allyson Lysaght, do hereby certify that a concurrence to this Motion to Dismiss was sought with Plaintiff. Plaintiff indicated that he did not concur with this Motion.

*s/ James J. Scanlon*

James J. Scanlon  
PA Attorney ID 79557

**CERTIFICATE OF SERVICE**

I certify that on March 10, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will transmit a Notice of Electronic Filing to pro se Plaintiff.

*s/ James J. Scanlon*

James J. Scanlon  
PA Attorney ID 79557